

Dwayne Henry
924442
8301 State RD
Phila Pa 19136


MAR - 5 2021

FEB 28, 2021

CASE NO. 20-5115

To The clerk of COURT:

Please find enclosed A copy of AN "Amended Complaint with Jury Demand" which I was Directed to file 'ON FEB 3, 21 in this District court By The Honorable Judge Smith. I was informed at the Hearing on FEB 3, 21 to file one copy with the clerk of court within 30 day please file the enclosed complaint and please send me a Time Stamp copy for my Record Thank you


Dwayne Henry

cc: file

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

DWAYNE HENRY

PLAINTIFF

v.

CASE NO: 20-5115

RICHARD ROSATI, JOHN DOE #1

JOHN DOE #2, JOHN DOE #3

NATHANEIL SMITH JR, T.M. JONES,

Sgt BRYANT, NURSE MORIE,

JOHN DOE #4, JOHN DOE #5,

- AMENDED COMPLAINT WITH JURY DEMAND -

Introduction

This is a Civil Rights action filed by DWAYNE HENRY, for Damages and an injunctive relief under 42 U.S.C. § 1983, alleging excessive use of force and denial of medical care and confinement in segregation in retaliation in violation of the eight, fourth, first, and fourteenth amendment and also wrongfully & intentionally destroying evidence depriving Plaintiff of the means to challenge the unlawful conduct in court in violation of the right to access to the court. The Plaintiff also alleges the torts of assault and battery and negligence.

Jurisdiction

The Court has Jurisdiction over plaintiff's claims of violation of Federal Constitutional Rights under 42 U.S.C. §§ 1331(i) and 1343.

The Court has supplemental Jurisdiction over plaintiff's state law tort claims under 28 U.S.C. § 1367.

Parties

- 1.) The Plaintiff, DWAYNE HENRY, is incarcerated at Philadelphia Industrial Correctional Center (PICC) 8301 State Road, Phila, Pa 19136
- 2.) Defendant RICHARD ROSATI, is a Philadelphia Police officer employed at the 26th District. He is sued in his individual capacity.
- 3.) Defendant NATHANIEL SMITH JR, is a Philadelphia Detective employed at the EAST Detective Division. He is sued in his individual capacity.
- 4.) Defendant JOHN DOE^{#1}, is a Philadelphia police officer employed at the 26th District. He is sued in his individual capacity.
- 5.) Defendant JOHN DOE^{#2}, is a Philadelphia police officer employed at the 26th district. He is sued in his individual capacity.
- 6.) Defendant JOHN DOE^{#3}, is a Philadelphia police officer employed at the 26th District. He is sued in his individual capacity.
- 7.) Defendant T. M. Jones, is a correctional officer employed at (PICC) whose full name is unknown to Plaintiff. she is sued in her individual capacity.
- 8.) Defendant Sgt. BRYANT is a correctional S whose full name is unknown to Plaintiff. He is sued in his individual capacity.
- 9.) Defendant JOHN DOE^{#4}, is a correctional officer at PICC whose full name is unknown. He is sued in his individual capacity.

10.) Defendant JOHN Doe #5, is a Disciplinary Hearing Officer employee at PICC whose full name is unknown. He or She is sued in his individual capacity.

11.) Defendant _____ is a correctional _____ employed at PICC whose full name is unknown. He is sued in his individual capacity.

12.) Defendant _____ is a correctional officer employed at PICC whose full name is unknown. He is sued in his individual capacity.

13.) Defendant _____ a correctional _____ employed at PICC whose full name is unknown. He is sued in his individual capacity.

14.) Defendant _____ employed at PICC. She is sued in her official and individual capacity.

Facts

15.) On the date of 10/6/17 as the Plaintiff was being transported to Temple Episcopal Hospital in the back of a Police Van handcuffed and shackled by defendant ROSATI and JOHN Doe #1, who both were wearing Body cameras, Defendant ROSATI stated to Plaintiff "IF you try to run once we get to the hospital I am gonna beat your Black ass."

16.) Shortly afterwards when the defendants arrived at the hospital the defendants escorted Plaintiff to the Emergency Room waiting area. Plaintiff was directed by one of the defendants to sit in a chair,

As Plaintiff awaited Plaintiff Ask def ROSATI to use the bathroom numerous Times in which he was ignored.

17.) After waiting several minutes and holding his bowels, A nurse approached and ask Plaintiff what was wrong with him? Plaintiff explained to the nurse that he was Just Assaulted on the streets by several officers and both his knee caps were busted open.

18.) The nurse Told plaintiff that he would need to get a x-Ray and to Follow her! As Plaintiff stood up and followed the nurse with both defendants on both sides of Plaintiff. As Plaintiff neared the x-Ray Room Plaintiff notice A bathroom and ask again could he use the bathroom def ROSATI stated "No"

19.) The nurse, Plaintiff and John Doe^{#1} all enter the x-Ray Room while def ROSATI stood outside the Room and closed the x-Ray Room Door. Plaintiff was directed to sit on the x-Ray Table. Plaintiff again ask def John Doe^{#1} could He use the bathroom and that it was an emergency! def John Doe^{#1} told Plaintiff that as soon as the x-Ray was over He could use the Bathroom.

20.) Plaintiff was then directed by the nurse to lay Back on the x-Ray table, then the nurse and def John Doe^{#1} walked over to a computer monitor in a side Room. Plaintiff then went through the motions of the x-Ray machine and as soon as the x-Ray machine shot off Plaintiff Jump up and head straight to the bath Room.

21.) As Plaintiff Reach the door to the X-Ray Room and open the door there stood def ROSATI and as plaintiff attempted to walk pass the defendant to go to the Restroom def ROSATI, swung a close fist striking Plaintiff in his Right Eye causing Plaintiff to stumble. Def ROSATI then Lean over and pick Plaintiff up off his feet and slammed Plaintiff on The Ground causing A Bucket of dirty mop water to spill all over Plaintiff.

22.) AS Plaintiff Struggle to his feet still shackles and handcuff then appear def John Doe #1 with A stungun in his hand def John Doe #1 then placed the stungun to Plaintiff neck, Due to plaintiff being covered in Dirty mop water Plaintiff Body begun to violently shake and Plaintiff loss control of his Bowels and deficate on himself.

23.) Defendant John Doe #1 then Removed the stungun then placed it to Plaintiff Back AS Plaintiff begun to crawl def ROSATI started kicking Plaintiff in his Face and head after multiple kicks def ROSATI Grab Hold of Plaintiff Face and started viciously slamming Plaintiff head into the Ground causing Plaintiff to loss consciousness.

24.) Following this incident Plaintiff was CRIMINALLY charged with aggravated assault, and Related offenses BASED on a False described events of the above incident. On or about August 6, 2020 Plaintiff Lawyer "Chris Montoya" informed Plaintiff that he filed a subpoena for the Bodycam Footage From def ROSATI and his partner (John Doe #1) However on or about August 14, 2020 Plaintiff's

Lawyer informed him "there is NO Recording of the Bodycam Footage of the incident from the defendants.

25.) Once Plaintiff awoken after being knock unconscious by Def ROSATI, Plaintiff was cover in blood and handcuff to a bed with a nurse at Plaintiff Bedside who informed Plaintiff that He was about to get staples (sutures) in his head because his head was split open. The nurse also informed plaintiff that He also needed His EYEBROW (RIGHT) Glued shut because of a Deep Laceration.

26.) Plaintiff Also Received numerous Lacerations to his Lips and a abrasion to his Neck and Back where the Stungun was placed Plaintiff front tooth was also Broken. As plaintiff was receiving the staples (sutures) in his head plaintiff informed one of the Police officer (JOHN DOE #2) who was watching over him that He's going to file a Lawsuit and that the whole incident is on Bodycam. JOHN DOE #2 stated to plaintiff "you'll never get the Footage" in a Joking MANNER

27.) Defendant Nathaniel Smith Jr was the leading investigating officer and responsible for ensuring provision of the USE of Force policy and procedures was followed regarding this incident. def Smith Duty was to interview and Document such interviews and Retain any and all Bodycam Footage from the def's and all Documented officers involved and Retain the hospital Footage of the incident.

28.) Defendant Detective Smith's Conspiracy with Def Rosati and Def John Doe^{#1} by Allowing These def's not to Report or Document there use of Force against Plaintiff And there use of Force with a weapon, And the injuries it Received. Despite the use of Force policy/Procedures.

29) Defendant Det Smith intentional Failure to Retrieved and Retain the Bodycam and hospital Footage of the incident has the same practical effect AS intentionally Concealing the defendant's illegal misconduct and destroying evidence since It is NOW too late to obtain such Footage. The Obstructive act of Def Smith has limit Plaintiff's ability to defend against the false charges Filed against Plaintiff and prevent Plaintiff from Proving the Full extent of Plaintiff Civil damages and his entitlement to Punitive damages with all material evidence.

30) Defendant Smith actions WAS Done to avoid any internal Affairs Review of the def's Rosati and John Doe^{#1} use of Force against Plaintiff. On or about September 24, 2020 Plaintiff was given a Criminal Discovery From Plaintiff's Lawyer. However in this Discovery it was Absent any material Documentation of any Force use on Plaintiff, any injuries Plaintiff Received or any Bodycam or Hospital Footage Review and Retained and Defendant Det Smith is noted AS the investigative officer of the incident.

31.) Defendant JOHN DOE #3 has been placed on notice of the abusive conduct of def's ROSATI and JOHN DOE #1 by a number of complaints and grievances over many months but failed to take disciplinary actions against them or otherwise control there behavior.

32.) ON 10/3/20 plaintiff filed a civil Rights actions For Damages under § 1983 against the multiple mention Philadelphia Police officers for the above described events. Since the filing of plaintiff's civil Rights action plaintiff has been receiving legal mail from the UNITED STATES DISTRICT COURT FOR the EASTERN DISTRICT OF PENNSYLVANIA.

33.) Plaintiff's legal mail clearly lable from the courts addressed to plaintiff at his current location at the Philadelphia industrial correctional center (P.I.C.C) has been handed to Plaintiff already open outside of Plaintiff's presents which Plaintiff has filed Grievances for against mail Room officials.

34.) Following Plaintiff's Filing of this civil Rights action against Philadelphia Police officers, ON December 17, 2020 at approx 12:30pm as the the lunch meal was being passed out def T.M. Jones along with two inmates arrived at my cell Door (F2-17). def T.M. Jones stated to the other two inmates with her "OH that's Henry the one suing the cops" I informed this defendant that I wish that she do not put my personal Business out there.

35.) Defendant T.M. Jones then stated in a loud manner "what are you going to do sue me you snitch and make sure you spell my name Right" def T.M. Jones then Graded her Name Tag to show me her name Then Slammed the cell Door in plaintiff's face. As clo T.M. Jones started to walk away From my cell The defendant started yelling "EVERYBODY HENRY IN 17 cell is A "RAT" and He's not a Tough guy yall He's suing the cops EVERYBODY."

36.) OTHER Inmates on the unit started yelling Disrespectful Comments to me and threatening comments to plaintiff, def T.M. Jones then yell out to my cellmate " Jacobs " " IF you Beat his ass I'll give you some commissary " my cellmate then went to the cell Door and shouted to defendant T.M. Jones " give it to me "

37.) Defendant T.M. Jones then Returned to my cell Door and open it and A BAG OF commissary was given to him. DEF T.M. JONES Then stated to plaintiff " you shouldn't Be Filing Lawsuits " Then shut plaintiff cell Door. Plaintiff then walk to the cell Door and informed DEF T.M. Jones that He will Be supplementing his lawsuit against her for retaliation. Defendant T.M. Jones stated " and IM waiting you up and getting your Job Taken away " the walked away From Plaintiff's Door.

38.) As Plaintiff Turned around away from the Door plaintiffs Cellmate punched plaintiff in the Face/mouth causing plaintiff to hit his Head on the cell door and fall to the ground. Plaintiff's Cellmate then stated "It's not personal" Plaintiff then Returned to his Feet and walked over to his Bunk and Sat Down.

39.) About 1hr later Defendant Sgt BRYANT arrived at plaintiff's Cell door and told plaintiff "to pack his shit" plaintiff Ask for what? def Sgt BRYANT then stated "you know yuv cant be telling people your going to sue them". Plaintiff then informed def Sgt BRYANT that def T.M. Jones is Retaliating against me for having a Lawsuit against the cops! Defendant Sgt BRYANT then stated "So" then walked off. As def Sgt BRYANT was walking away plaintiff heard him shouting "we have A RAT in the house/unit". Inmates again started yelling Disrespectful and Threatening comment to Plaintiff.

40.) About 1hr later def Sgt BRYANT along with 5 to 6 other correctional officers Return to plaintiff's cell door with A large Can of pepper spray. def Sgt BRYANT had a hand held camera in his hand pointed at plaintiff Cell door. Defendant Sgt BRYANT then stated to plaintiff "Turn around and face the wall to be handcuff". Plaintiff then stated Loud and clear so that it could be Recorded on camera that "I am suicidal and wish to speak with mental Health."

41.) Plaintiff also informed defendant Sgt BRYANT "that out of fear and due to his mental health issues if his cell door is open plaintiff will cut his waist with a razor blade." as plaintiff was stating this def Sgt BRYANT ordered one (1) of the officers to spray into plaintiff cell. plaintiff cell was then sprayed with a massive amount of pepper spray covering plaintiff full body and cell.

42.) Plaintiff cell door was then open and several officers enter plaintiff's cell and handcuffed plaintiff behind his back. Plaintiff was then escorted to medical Dept and at the medical Dept plaintiff informed defendant nurse Marie that he was just pepper sprayed and wish to be decontaminated however def nurse Marie ignored plaintiff.

43.) Defendant nurse Marie after ignoring plaintiff's request to be decontaminated asked Sgt BRYANT "what is plaintiff's Prison ID" number? Def Sgt BRYANT stated that he doesn't know it. Defendant JOHN DOE #4 then twisted plaintiff's wrist (still handcuffed) causing plaintiff bone to snap and slammed plaintiff's face into the wall in an attempt to get plaintiff's Prison ID number off of plaintiff ID armband.

44.) After Def JOHN DOE #4 read plaintiff's ID number to def nurse Marie, plaintiff again ask to be decontaminated in which he was ignored again by nurse Marie. Plaintiff then stated that he feels suicidal so that he could receive help from the mental health staff.

plaintiff was then escorted to the Receiving Room never being decontaminated of the pepper spray cover plaintiff whole body. At the Receiving Room plaintiff was placed in a cell to await mental Health staff.

45.) As plaintiff awaited mental Health staff to arrive in handcuffs and shackles with plaintiff skin burning from the effect of the pepper spray for about 1 hr, finally psychologist Ms. Thomson arrived at the cell door and ask to speak with plaintiff. Plaintiff then informed Ms. Thomson of all the above-described events. Also plaintiff informed Ms. Thomson that he now fears for his safety since multiple inmates and correctional officers now knows of his pending lawsuit and how he's being lable as a "rat" and "snitch".

46.) Psy Ms. Thomson advise plaintiff that he should try to wash the pepper spray off once he gets to his cell. Also Ms. Thomson stated she will request that plaintiff be place in protective custody or at the least be placed in a cell by himself. About 30 minutes after that plaintiff was then escorted to the Hole and place in a single cell by himself.

47.) Never was plaintiff seerved any misconduct report for violating any rules, nor was plaintiff ever decontaminated, plaintiff was force to wait for a shower for the next 2 days. On Dec 19, 2020.

On Dec 19, 2020 plaintiff also submitted a grievance regarding the above-describe events and requested that the camera footage from the hand held camera of Sgt Bryant be retained and held for further litigation and also the camera footage of the unit (F2) camera which was located in front of plaintiff cell (F2-17) be held for further litigation.

48.) On Dec 29, 2020 As plaintiff was being escorted to the shower by officer Kilson and officer Lewis plaintiff asked these officers "Does He have any hole time and is there any misconduct report on file against plaintiff." officer Lewis stated that "He'll check the computer". After plaintiff shower was complete and plaintiff was being escorted back to his cell officer Lewis informed plaintiff that he has "0" amount of hole time and that there is a misconduct report on file against me issued by det T.M. Jones for threatening.

49.) In accordance with "Inmate Discipline procedures" when a inmate is issued a misconduct he will be given a copy of the misconduct and a formal hearing will be scheduled within (7) working days of completion of the fact-finding.

50.) Due to being placed in the hole plaintiff was only allowed a shower every other day for 15 minutes and lock down the rest of the day. plaintiff was not allowed any access to make telephone calls to his family or access to the law library to prepare for his scheduled trial on Jan 20, 2021.

51.) ON Jan 6, 2021 after experiencing mental Health issues Due to plaintiff's continuance in lockdown status plaintiff was seen by staff from the mental Health Department and after expressing his mental Health issues plaintiff was prescribed mental Health medication which plaintiff was informed By the prescribing Doctor that will help with voices and sleep But is not safe for plaintiff blood levels and Health so once plaintiff is Release From the Hole plaintiff will have to Reconsider this medication.

52.) ON Jan 7, 2021 plaintiff was called to his cell door by another Inmate in the cell right across from plaintiff cell name Emanuel Bryant. This Inmate informed plaintiff that He Just had a conversation with defendant T.M. Jones who came on the unit while He was in the Phone cage near the Front Door of the unit. Defendant T.M. Jones informed Inmate Bryant that plaintiff is A "Rat" for this pending lawsuit and Also informed him that she is defendant JOHN DOE #5 (Hearing examiners) personal Assistance

53.) Inmate Bryant further informed plaintiff that def T.M. Jones said that Due to her being JOHN DOE #5 (Hearing examiners) Assistance she is stopping plaintiff's hearing from happening, which is the Reason why plaintiff is still being housed in the Hole beyond the Time set forth in the Inmate Disciplinary Procedures/Policy.

54.) Inmate Bryant also informed plaintiff that T.M. Jones also informed him that due to her being def John Doe's personal assistant she can get him out the hole if he assaults plaintiff by throwing feces on plaintiff. Plaintiff then requested that Inmate Bryant write a declaration describing the above event.

55.) For the next following weeks plaintiff remained on J-unit in the hole not allowed access to any social or legal phone calls or the law library and locked inside a cell for 24 hrs a day except for a 15 minute shower every other day. Due to a falsified misconduct report made by defendant T.M. Jones.

56.) ON Feb 1, 2021 As the noon lunch meal was being handed out by the unit officer plaintiff was handed a "Disciplinary Hearing Summary Report" along with his meal. After review of this report it is noted/documented that a "hearing" was held outside plaintiff presents and plaintiff was found guilty of several charges and sentence to 30 days in the hole, starting on Dec 17, 2020 and ending on Jan 16, 21.

57.) Defendant T.M. Jones is noted/documented on the "Disciplinary Hearing Summary Report" as the "Discipline Coordinator", NO disciplinary hearing officer is noted or sign this form nor is it noted that the warden reviewed and sign this form.

58.) JOHN DOE #5 is the "Disciplinary Hearing Officer" and is responsible for conducting disciplinary hearings for inmates accused of breaking prison rules. However due to JOHN DOE #5 conspiring with defendant T.M. Jones by allowing def T.M. Jones to conduct plaintiff's hearing and sentence plaintiff to disciplinary detention.

59.) plaintiff was denied his fundamental due process rights by def's DOE #5 and T.M. Jones. The defendants failed to give plaintiff notice of any charges or misconduct issued against plaintiff, a written statement of the evidence behind the decision and the reasons for the punishment imposed. Plaintiff was also denied his right to call any witnesses or present evidence or be present at any hearing.

60.) Plaintiff has suffered irreparable harm in the form of continued physical and mental pain and suffering due to the denial of his due process rights to disciplinary practices that were unfair and inconsistent with the 14th amendment. Plaintiff's right to access to the courts also has been hindered due to plaintiff being unable to access a law library and call his attorney to prepare for trial on Jan 20, 2021, which has been postponed 7 months causing plaintiff to be incarcerated longer.

CLAIMS FOR RELIEF

- 61.) The actions of defendants ROSATI and Doe^{#1} in using physical force against the Plaintiff without need or provocation and failing to intervene to prevent the misuse of force were done maliciously and sadistically constituted cruel and unusual punishment in violation of the 4th and 8th Amendment.
- 62.) The actions of defendants ROSATI AND Doe^{#1} in using excessive force against the Plaintiff was objectively unreasonable constituting the tort of assault and Battery under the law of Pennsylvania.
- 63.) The actions of defendants ROSATI, SMITH, Doe^{#1, 2} in conspiring to wrongfully and intentionally destroy evidence in a cover-up of misconduct depriving plaintiff of the means to challenge the unlawful conduct in court violates the Right of access to the courts.
- 64.) The Failure of defendant JOHN Doe^{#3} to take disciplinary or other actions to curb the known pattern of physical abuse by defendants ROSATI and Doe^{#1, 2} constituted deliberate indifference to plaintiff and others safety, and contributed to and proximately caused the above-described violations.

65.) The actions of defendant T.M. Jones, Sgt BRYANT, NURSE MARIE and Doe # 5 & 4 incorporated by Reference paragraphs 34-60 were Done for exercising plaintiff Right to seek Redress from the Courts through plaintiff's pending Civil suit. The defendants are Retaliating against plaintiff unlawfully in Violation of plaintiff's Right under the First Amendment.

66.) The actions of defendant T.M. Jones in calling plaintiff A "Rat" and "Snitch" and disclosing information to other inmates of plaintiff pending suit constitutes deliberate indifference to plaintiff safety in violation of the 4th and 8th amendment.

67.) The actions of T.M. Jones in informing other inmates that plaintiff is a "Rat" and "Snitch" was Done in Retaliation in violation of the First, Fourth and Eighth Amendment.

68.) The actions of def T.M. Jones in paying plaintiff's cellmate commissary to attack plaintiff was done in Retaliation and was deliberate indifference in violation of the First, Fourth and Eighth Amendment.

69.) The actions of Sgt Bryant in calling plaintiff A "Rat" in front of other inmates was Done in Retaliation constituting deliberate indifference in violation of plaintiff's 1, 4, 8, Amend.

- 70.) The actions of Sgt Bryant in ordering another officer to pepper spray plaintiff when plaintiff was seeking mental health treatment was done in retaliation and denied plaintiff medical treatment in violation of plaintiff First, Fourth, Eighth Amendment.
- 71.) By witnessing defendant John Doe #4 illegal actions, failing to correct that misconduct, and encouraging the continuation of the misconduct, def Sgt Bryant also violated plaintiff right under the Eighth Amendment.
- 72.) Defendant John Doe #4 used excessive force against plaintiff by slamming plaintiff face into the wall and twisting plaintiff wrist causing physical injury when plaintiff was not violating any prison rule violates plaintiff's right under the First and Eighth Amendment.
- 73.) The actions of defendant Nurse Marie in failing to provide plaintiff with a reasonable opportunity to decontaminate constitute deliberate indifference in violation of plaintiff First, Fourth and Eighth Amendment.
- 74.) The actions of def John Doe #5 in not allowing plaintiff to call witnesses and finding plaintiff guilty with no evidence to support the charges and providing no written disposition of the charges, or providing plaintiff with notice of the charges denied plaintiff due process of law in violation of the 14th Amendment.

75.) The actions of defendant Sgt Bryant in ordering another officer to pepper spray plaintiff when plaintiff was seeking mental health treatment and not allowing plaintiff a reasonable opportunity for decontamination constitute deliberate indifference and excessive force in violation of the 4, 8, Amendment.

76.) The actions of Sgt Bryant in Refusal without cause to Alleviate the weapon (pepper spray) harmful effects constitute excessive force in violation of Plaintiff's Eighth Amendment.

PRAYER FOR RELIEF

WHEREFORE, plaintiff Respectfully prays that this court enter Judgement:

77.) Granting plaintiff a declaration that the act and Omissions described herein violates plaintiff's Rights under the Constitutional.

78.) Granting plaintiff compensatory damages in the amount of \$ 1,000,000 against each defendant, jointly and severally.

79.) Granting plaintiff punitive damages in the amount of \$1,000,000 against each defendant, jointly and severally.

80.) plaintiff also seek a jury trial on all issues triable by jury.

81.) plaintiff also seek recovery of his costs in this suit, and

82.) any additional Relief this court deems just, proper, and equitable.

Dated: FEB 28, 2021

Respectfully submitted

Dwayne Henry

924442

8301 State Road

Phila, PA 19136

VERIFICATION

I have read the foregoing supplemental complaint and hereby verify that the matters alleged therein are true, except as to matters alleged on information and belief, and as to those, I believe them to be true. I certify under penalty of perjury that the foregoing is true and correct.

Executed at (PCC) Phila, Pa 19136

Dwayne Henry

Dwayne Henry

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Dwayne Heney,
Plaintiff

v.

RICHARD ROSATI, et al.,
Defendants

Civil ACTION
NO: 20-5115

CERTIFICATION OF SERVICE

I hereby certify that on the date below, the Amended Complaint with Jury was filed with the clerk of court by first class mail, postage prepaid, as follows:

clerk of court. EDPa

Room 2609
601 Market St
Phila, PA 19106

Date: Feb 28, 2021

Respectfully submitted
Dwayne Heney
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U.S.M.S.
X-RAY

